

**From:** [Michael PINTO](#)  
**To:** [Bury, Carolyn](#)  
**Subject:** Arkema East Plant Bi-Monthly Report  
**Date:** Friday, September 13, 2013 2:45:51 PM  
**Attachments:** [July August 2013.pdf](#)

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Carolyn,

Attached please find the Bi-Monthly Progress Report for the Arkema East Plant in Wyandotte, Michigan. The attached report covers the July/August 2013 reporting period.

Michael Pinto  
RETIA USA LLC/Legacy Site Services LLC  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341  
Office: 610 594-4435  
Fax: 610 594-4439



\*\*\*\*\* ATTACHMENT NOT DELIVERED \*\*\*\*\*

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September 13, 2013

*via overnight courier*

United States Environmental Protection Agency  
Region V  
RCRA Enforcement Branch (HRE-8J)  
77 Jackson Street  
Chicago, IL 60604  
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order  
Docket No. V-W-89R-45  
Arkema Inc.  
Riverview, Michigan  
MID 005 363114  
Progress Report #141

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of July and August 2013. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for September and October 2013 is also included.

**I. East Plant Activities Completed in July and August**

**CMS Task IV**

The CMS is currently under review by USEPA.

### Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,158,660 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 14,870 gallons of groundwater were extracted and treated during the reporting period.

### Other Activities

LSS, on behalf of Arkema, is participating in a Great Lakes Legacy Act project to complete an RI/FS in the Trenton Channel. Work on this project is ongoing. A revised FS including an additional remedial alternative will be completed in 2013. It is expected that in 2013 LSS, GLNPO, and other non-federal parties will execute a GLLA Project Agreement to prepare a remedial design.

## **II. Corrective Action Activities Anticipated for September and October 2013**

### CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

### Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto  
Principal Environmental Engineer  
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing  
Mr. Laura Verona- MDNR - Waste Management Div. Livonia